

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Erin Wilson, on behalf of all)	
others similarly situated,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION FILE
)	NO. 1:25-cv-03262-VMC
Grocery Delivery E-Services)	
USA Inc.)	
)	
)	
Defendant.)	
_____)	

**JOINT MOTION TO EXTEND DEADLINE
FOR JOINT PRELIMINARY REPORT AND DISCOVERY PLAN**

For good cause shown below, Plaintiff Erin Wilson and Defendant Grocery Delivery E-Services USA Inc. (collectively, the “Parties”), by and through their undersigned counsel, respectfully move this Court to extend the deadline for filing their Joint Preliminary Report and Discovery Plan, currently due on October 6, 2025, to October 27, 2025.

In support of this request, the Parties state good cause exists to grant the requested extension as follows:

1. The Parties have been actively conferring regarding the issues raised in this case and have been exchanging information concerning arbitrability issues,

including Plaintiff's knowledge (or lack thereof) regarding an individual who might have provided Plaintiff's telephone number to Defendant.

2. Additional time is needed to complete these exchanges and to allow the Parties to incorporate the information into their Joint Preliminary Report and Discovery Plan. Indeed, the parties might very well resolve contested issues and thus eliminate the need for the Court to use its resources addressing them. Thus, granting the request will further judicial economy and conserve resources.

3. The requested extension is sought in good faith, is not made for purposes of delay, and will not prejudice any party or unduly burden the Court.

4. This is the Parties' first request for an extension of this deadline.

5. The Parties preserve all rights and defenses, and do not waive any, by entering into this joint motion. The Parties agree that they shall not use anything herein to argue that Defendant waived its right to seek to compel Plaintiff especially because Defendant's investigation is ongoing and the determination to seek to compel arbitration has not been made.

WHEREFORE, the Parties respectfully request that the Court extend the deadline for filing their Joint Preliminary Report and Discovery Plan from October 6, 2025 to October 27, 2025.

Respectfully submitted in this 3rd day of October, 2025

/s/ Anthony I. Paronich

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